## EXHIBIT E

## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re Flint Water Cases

Case No. 5:16-cv-10444-JEL-EAS

Hon. Judith E. Levy Magistrate Judge Elizabeth A. Stafford

## AFFIDAVIT OF CRISTIN LARDER

Cristin Larder, being duly sworn, deposes and states as follows:

- 1. This Affidavit is based on my personal knowledge and, if sworn to testify, I can do so competently regarding the facts in this Affidavit.
- 2. During the period of 2014 and 2015, I was employed at the Michigan Department of Health and Human Services as the Home Visiting Epidemiologist in the Maternal Child Health Epidemiology Section.
- 3. I have reviewed <u>Veolia Water North America Operating Services</u>, <u>LLC's</u>, <u>Veolia North America</u>, <u>Ilc'S</u>, <u>and Veolia North America Inc.'s</u>

  <u>Disclosure of Expert Opinions Pursuant to Federal Rule of Civil Procedure</u>

  <u>26(a)(2)(C)</u>, dated February 3, 2023, pp. 12-17 (Veolia Expert Summary). Which characterizes my testimony as "expert testimony" for an upcoming Flint Water trial.

4. A significant portion of the expert testimony referenced in the Veolia

Expert Summary includes testimony regarding matters about which I do not believe

I am an expert.

5. As an example, the Veolia Expert Summary makes repeated reference

to my involvement and preparation of Shewhart Charts. Prior to my preparation of

Shewhart Charts in the Summer of 2015, I had never prepared such a chart before,

nor have I prepared one since, and it is not an area in which I believe I possess

expertise.

This concludes my affidavit.

Subscribed and sworn to before me on November 26, 2023

Cristin Larder

Notary Public

County, MI

My Commission Expires: 08-16-2027